

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

TRACBEAM, L.L.C., a Colorado limited liability company,

Plaintiff,

vs.

AT&T INC., a Delaware corporation; AT&T MOBILITY L.L.C., a Delaware limited liability company; METROPCS COMMUNICATIONS, INC., a Delaware corporation; METROPCS WIRELESS, INC., a Delaware corporation; TEXAS RSA 7B3, L.P. D/B/A PEOPLES WIRELESS SERVICES, a Texas corporation; SPRINT NEXTEL CORPORATION, a Kansas corporation; SPRINT SPECTRUM L.P., a Delaware limited partnership; NEXTEL OF CALIFORNIA, INC., a Delaware corporation; NEXTEL COMMUNICATIONS OF THE MID-ATLANTIC, INC., a Delaware corporation; NEXTEL OF NEW YORK, INC., a Delaware corporation; NEXTEL SOUTH CORP., a Georgia corporation; NEXTEL OF TEXAS, INC., a Texas corporation; NEXTEL WEST CORP., a Delaware corporation; CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS, a Delaware partnership; GOOGLE, INC., a Delaware corporation; and SKYHOOK WIRELESS, INC., a Delaware corporation.

Defendants.

CASE NO. 6:11-cv-96

Jury Trial Demanded

AGREED MOTION TO STAY DEADLINES

Plaintiff TracBeam, LLC ("TracBeam") respectfully files this Agreed Motion to Stay Deadlines and would show the Court as follows:

Because of an agreement in principle, the Court granted on December 14, 2011 (D.I. 128) and on January 17, 2012 (D.I. 136), TracBeam's Motions to Stay Deadlines for 30 days between TracBeam and Texas RSA 7B3, L.P. d/b/a Peoples Wireless Services ("Peoples Wireless").

Because of continuing efforts to reach a settlement in principle, TracBeam requests an additional thirty (30) day stay of upcoming deadlines with regard to Peoples Wireless. TracBeam seeks this extension of time not for delay but for good cause and that justice may be served. Peoples Wireless is not opposed to the relief requested in this motion.

WHEREFORE, PREMISES CONSIDERED, TracBeam prays that the Court enter the attached order and stay all pending deadlines between TracBeam and Peoples Wireless for thirty (30) days.

Dated: February 16, 2012

Respectfully submitted,

By: /s/ Elizabeth L. DeRieux

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**ATTORNEYS FOR PLAINTIFF
TRACBEAM, L.L.C.**

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this February 16, 2012 with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Elizabeth L. DeRieux
Elizabeth L. DeRieux